

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

IN RE:  
DANNY Y. CHEONG

**Case No.: 14-31583TBA**

**HEARING DATE: 01/15/2015**

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**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The Debtor has failed to file all applicable Federal, State and local tax returns as required by 11 U.S.C. Section 1308, in violation of 11 U.S.C. Section 1325(a)(9).  
Specifically, tax returns fail to show a business ownership.
- Debtor has failed to provide proof of current income.  
Specifically, contributions.
- Debtor has failed to provide proof of income for the 6 month pre-petition period.  
Specifically, all sources.
- Copy of loan modification application must be docketed prior to confirmation.
- Loan modification must be approved within 6 months of filing.
- Debtor must make post petition adequate protection/mortgage payments pending loan modification acceptance.
- Schedules I, J, B22C and the Statement of Financial Affairs are incomplete or inaccurate.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: December 04, 2014

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee